LAW OFFICE OF AMY JANE AGNEW, P.C.

The Honorable Nelson S. Román Federal Building and United States Courthouse

300 Quarropas St.

White Plains, NY 10601-4150

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DATE FILED: 3/19/2025

March 13, 2025

VIA ECF

Re: Holmes v. Bentivegna, et al., 23-cv-5462

Dear Judge Roman:

The Court recently granted this Office an extension of time to respond to Defendant's premotion to dismiss letter until March 17, 2025. (Dkt. No. 67.) Unfortunately, due to the recent strikes and the severe backlog in legal calls at Green Haven we could not get a call scheduled until very late March. However, today Green Haven alerted us that legal visits have restarted. As I can visit much sooner than I can gain a legal call, I will be traveling to Green Haven on March 21, 2025 to meet with Mr. Holmes in person. Given that schedule, I would respectfully request that the Court all me until March 24, 2025 to respond to the letter. This way I can meet with my client in advance of my response.

We thank this Court for its continuing courtesies and attention to this matter.

Very truly yours,

The Court GRANTS Plaintiff counsel's request for an extension of the deadline to respond Defendant Connolly's pre-motion letter to March 28, 2025. This will be Plaintiff's final extension to respond. The Clerk of Court is kindly requested to terminate the motion at ECF No. 70.

/s/ AJ Agnew

Amy Jane Agnew, Esq.

Dated: March 19, 2025 White Plains, New York

> NELSON S. ROMÁN United States District Judge

SO ORDERED: